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Anne-Marie Daune-Richard

abstract

For T.H Marshall, the notion of modern citizenship emerged in opposition to feudal notion of status, which defines the relations between individual on the basis of their position in an intangible social order. The first principle of modern citizenship – civil citizenship – is based on contractual relations. Contracts formalize relationships between individuals who are free (to commit themselves) and equal (principle of equality between the contracting parties). Of particular importance here is the wage contract. Indeed, it is participation in paid work that is the basis for individual autonomy and hence for individual freedom. The wage contract combines direct remuneration and individualized social rights linked to wage work and provides access to social citizenship. In many societies, however, women's access to social protection was based not on their position as wage-earners but rather derived from their family status. And it was this definition in terms of status that limited their 'capacity' and prevented them from acquiring the full individuality that is a condition of modern citizenship. Women entered the wage society in different ways and at different times from men.

How did different European countries conceive and manage the relationship between women's work and 'their' family responsibilities? Posing this question will lead us to examine the various ways in which access to the labour market has been linked to social rights and the gendered character of this link.

We will examine how the work-family relation is differently constituted and institutionalized in France, the UK and Sweden, focusing on two points of entry: the public and private management of the time given over to paid work and to family matters and childcare.

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The wage society is a form of social organisation where social protection is no longer based on the community or property but on individualised social rights tied to paid employment. Thus, such an organisation can only exist in a society based on the individual, where each person is a full member of the community of citizens and has the right—and the duty—to contribute as such to its economic, legal and political affairs. The social bond is then organised around the contract, which replaces the feudal notion of status inherited from a 'condition'. The contract is thus, in theory at least, a formalisation of the relations binding individuals who are free (to commit themselves) and equal (the principle of the equality of the parties).

By abolishing the feudal orders, the French Revolution 'liberated' labour from feudal dependence so that it could be employed 'freely' by any employer. In this way, it opened the way to the gradual institutionalisation of market labour through the bond of wage employment (initially a hiring contract). But this process mainly concerned the male population; for women, it was implemented belatedly and very incompletely, in the sense that, where the male labour force was 'freed' (from feudal subjection), women were in fact 'confined' (in family dependence). At the time when work became a central value, providing a base for the individual's social existence and thus lying at the very heart of free and equal citizenship, women found themselves excluded from work, individual social status and citizenship (Daune-Richard 1997).

By defining women as 'dependent' on family ties, the French Revolution refused them their individual status. Because of this dependence, they were, like servants, denied access to the 'full' individual status which was a condition of citizenship (Rosanvallon 1992). In this new social organisation, the individual nature of the relationship to work and employment (because it depended on the contract) meant that women could not be fully integrated. And thus, for a very long time, the family bond was to define their relationship to employment: either they contributed to the production of the family-run company, with the husband occupying the dual role of family head and company head, or they entered the paid labour market, but under their husband's control.

In France, this new conception of the social sphere was formalised in the Napoleonic Code of 1804. Married women were henceforth defined as minors; they could not directly exercise the civil rights which regulated relations between free and equal individuals and, at

the same time, regulated the exchange of goods (signing contracts, going to court—only their husbands were authorised to manage the wife's own goods).

How did women enter the wage society? Not through paid employment—which was for them contingent and intermittent because it was subject to the duties and hazards of family life—but massively as beneficiaries of rights derived from their family status. And this brings us back to the question of women's access to full individual status. French women obtained the right to vote in 1944 but it was only in the 1960s and later that their status in society came significantly closer to that of men. This advance took place through concomitant movements in the legal, economic and social domains—a considerable enlargement of their civil rights, widespread access to paid employment and the social rights accompanying it.¹ It was as if they made their entry into the wage society at the same time that, in legal terms, they gained access to the status of individual.

In what follows, we shall examine the 'specific' (relative to the male 'referent') and belated entry of women into wage society by comparing the situation in three different countries: France, Great Britain and Sweden. In his analysis of 'welfare state regimes', Esping-Andersen (1990, 1999) places these three countries in different groups which he defines respectively as 'corporatist', 'liberal' and 'social democrat'. But his typology only refers to interrelationships between the State and the economy (1990). In the debate set off by the appearance of this study, feminist researchers demonstrated the importance of integrating the family into the analysis of welfare states. On the one hand, the family is a private locus for the production of goods and services (Orloff 1993) and, on the other, the unequal, gender-based distinction between paid and unpaid labour blurs the boundaries between 'commodification' and 'de-commodification' which form the basis of social citizenship. The universal notion of citizenship which lies at the heart of the welfare state is thus problematic (O'Connor 1993, 1996). In his 1999 work, Esping-Andersen recognises the importance of taking the family and housework into account in the analysis of post-industrial societies. But he fails to see the power relations existing within the family, much less the necessity of reasoning in terms of individual autonomy. In fact, access to the labour market governs the mother's ability to maintain a household in an autonomous way, without being obliged to depend on a husband for access to an income and social rights (Orloff 1993, O'Connor et al. 1999).

The remarks presented here come within the scope of this debate. How has women's access to full citizenship—offered by the social rights tied to paid work in the welfare state—been conceptualised and put into practice? In examining how France, the United Kingdom and Sweden have conceived and managed the relationship between women's employment and 'their' family responsibilities, we shall question the relationship which these three countries establish—in different ways for men and women—between access to the labour market and social rights. We shall develop our analysis around the key period of the 1950s, which saw the expansion and consecration of the wage society in the West. From this point of departure, the analysis will go back in history to establish its foundations and then observe its evolutions over the past three decades.

We shall focus on two archetypal 'models': that of the 'wife-mother' and that of gender equality. The first is based on the principle that women's primary social context is the domestic space, where they are in charge of family responsibilities. The second asserts the equality of men and women in face of professional and family responsibilities. We shall examine how the job-family relationship is combined and institutionalised differently in the three countries at hand by targeting two issues:

- the amount of time devoted to the labour market and family matters

¹ . This means that they gained access to 'civil citizenship' (historically the first of the three forms of citizenship distinguished by T. H. Marshall [1950]) several centuries after French men.

- childcare
and the ways they are handled in both public and private spheres.

I. The wife-mother model²

In the 1950s, this was the dominant model in all three countries under review. Women tended to withdraw from the labour market following marriage and childbearing and public schemes encouraged the non-participation of mothers. This behaviour and the public action supporting it reflect principles elaborated by nineteenth-century social theorists and economists. The 'two spheres' theory, for example, proposed by John Ruskin in 1864, affirmed that the world of women is different from that of men. Around the same time, economists developed a theory of the 'family wage' which maintains that a man's wage ensures not only his own existence but also that of a family (because he is responsible for the reproduction of the labour force), while that of the woman is supposed to cover her own needs alone (Adam Smith, *The Wealth of Nations*, 1880). What we have here is a 'scientific' construction of the idea of the 'secondary wage' and wage inequalities between men and women, which took root to varying degrees depending on the country.

Joan Scott (1990, 1992) emphasises that, by proposing two different 'laws' concerning wages, two systems for evaluating labour, these economists established a gendered division of labour held to be 'functional' because each group, men and women, occupied its proper place (its 'world') and played its proper role. She also stresses that, for such economists, these two series of laws—those of the market and those of biology—were 'natural'. And 'natural' means indisputable, something which imposes itself 'naturally'. Finally, Scott shows that within this approach, women's production ultimately had no economic value because the worker's family wage remunerated the production of value and at the same time gave the worker his status as the household's creator of value. Thus, neither the (natural) domestic activities of women nor the (limited) remuneration of their market labour had value.

These theories underlie the wife-mother model which, in its basic outlines, is found in France, the United Kingdom and Sweden during the 1950s. The fact that the larger historical contexts are different in each country, however, gives rise to particular configurations (and, as we shall see, evolutions). These differences stem from, among others, the variable forms and time frames of industrialisation and the expansion of the wage-earning population. Indeed, it was with the gradual separation of the 'space-times' of family life and paid work that the question of the 'reconciliation' of these two worlds came to be posed (to women!). But the differences also result from political philosophies which do not define in the same way such basic concepts as citizenship and the role of men and women within it, or that of relations between the State, the citizen and the 'order of the sexes'.³ For the analysis which follows, we shall draw on the typology of Jane Lewis (1992), who describes three 'conjugations' of this model: strong, modified and weak.

1.1. The United Kingdom: the wife-mother model at its high point

The introduction of this model in the United Kingdom was favoured by several historical and institutional factors. Unlike France, industrialisation was directly based on the model of large-scale industry. The growth of a wage society and the separation of the workplace from the living space took place much earlier than in France. And the organisation of the family according to the 'one breadwinner' conjugal model occurred at the same time (cf. Scott and Tilly 1978): the husband held a paid job while the spouse was responsible for family matters (thus creating the necessity of a 'family' wage for the man). The 'two spheres' theory which

² . The expression commonly used in Anglo-American research is the 'breadwinner' model. Since this analysis is focused on the entry of women into wage society, I have opted for a term which reflects the woman's position.

³ . 'Order' refers here to the double idea of classifying, placing in a certain order, creating a hierarchy, and maintaining the established order.

maintained that men and women implement their qualities and competences in separate spaces (i.e., the domestic space for women) was particularly significant in England and the power of the wife-mother model was consistent with that construction.

In such a context, married women were long excluded from the labour market. Two rules institutionalised this model. The first, that of the 'marriage bar', was introduced in the second half of the nineteenth century. Defended by unions and employers alike, it meant that women gave up their jobs once they were married. It was gradually abolished as of the 1940s but persisted in certain sectors until the 1960s (Hakim 1987). The second rule, the 'married women's option', which was instituted at the beginning of the twentieth century, allowed these women, when they held a paid job, to 'opt' for dependence on their husband's benefits, in which case they paid no social security contributions (or reduced ones) and had no benefits of their own (or reduced ones). This option carried over to the National Insurance Scheme introduced in 1946. In addition, married women who desired to remain in the system paid full contributions but were entitled to lower benefits than those of single women or married men. And a dependency allowance (younger sister of the French single-wage allowance [*allocation de salaire unique*, ASU], which will be discussed below) encouraged married women not to work outside the home (Siim 2000: 93-94). This 'option' was eliminated in the 1970s with the introduction of equal- opportunity legislation.

The labour-market participation of married women was thus very limited in England from the beginning of the century until 1930 (10 %).⁴ It rose sharply in the 1960s (26 % in 1951, 50 % in the 1970s [Lewis 1992: 164]). In any case, women enjoyed limited social benefits tied to employment. Thus, the national health insurance system, created in England in 1911, only covered women who were employed full-time (Lewis 1992: 163) and there was no maternity leave. In fact, the family wage was an underlying principle in this system (Siim 2000: 82).

One other feature of the United Kingdom, in contrast to France, is the deliberate absence of a family policy. (As we shall see, Sweden adopted the same position, but with a completely different content.) In order to situate the family question in England, it is necessary to go back to the creation of the modern State. In England, the separation of the public and private spheres which characterise 'modern' societies was taken to mean that the family should not come under State control. If in France the State was seen as the protector, in England, it was perceived as a potential threat to private life and liberties.⁵ For this reason, the family was supposed to be shielded from State intervention. Thus, traditionally, and even today, family allowances, like the provision of public childcare, are extremely limited and tax deductions aimed at assisting families with children are non-existent.⁶

The extent of part-time work and the forms it has taken reflect the position of women in the British wage society. Given what has just been indicated about the historical construction of the entry of British women into the ranks of the wage-earners, when they began to present themselves on the labour market, part-time work was the only option which could really be envisioned, combined with the interruption of their activity until the children reached school age. Many women thus sought short-term, part-time jobs which were often devoid of social rights.

⁴ . By comparison, the rates in France were 50 and 44 percent in 1901 and 1931, respectively (Hantrais 1990: 109).

⁵ . One possible explanation for this phenomenon is that in France, with the Revolution of 1789, the people won the power and their rights, whereas in England these rights were granted 'top down', thus making the people 'subjects with rights' (Brian Turner 1993, cited by Siim 2000: 80). The heritage of the poor laws and the control of private life (as well as the denial of women's right to vote until 1918) which the recourse to this system of aid implied surely played a role as well in this representation of public intervention.

⁶ . Siim (2000: 96) notes that, in contrast to all the other industrialised countries, Great Britain's public childcare provision actually decreased between 1945 and 1984.

Overall, British women were caught in a constantly growing structural contradiction between formal civil and civic rights, which were acquired quite early on (1928 for the right to vote), and an economic dependence in relation to their husbands. Was this due to the importance of the 'two-sphere' theory? Notwithstanding their widespread mobilisation, British feminists ultimately made few demands for a proper place in the world of work. Their demands were aimed rather at reducing dependence on the husband by remunerating the mother; in this sense, family allowances were a feminist demand (intended to guarantee mothers an income equivalent to that of women workers and improve the children's situation [Harris 1994]). Thus, in a country where citizenship is so profoundly rooted in independence (Harris: 172-173), women seem to have acquired their civic rights through the recognition of their social value as mothers and wives (cf. Rosanvallon 1992), while their access to autonomy and economic individuality through their role as wage-earners was not a major issue.

I.2. France: a composite model

The prolonged, widespread survival of independent forms of family production developed and preserved a tradition of work activity for married women, either in the context of the family concern (with the employment status of unpaid family assistants) or in forms of cottage labour. Paid work outside the domestic framework was reserved for young women (before they became mothers) or those who were single or in an extremely needy family situation (handicapped or alcoholic husband, etc.).

In its social philosophy, France was torn between two heritages (Commaille 1993): on the one hand, a vision of the family as a component of the social and political system, inherited from the Ancien Regime, and on the other, a conception of the social bond, inherited from the philosophy of the Enlightenment and the Revolution, where the individual constitutes a key reference and the contract between individuals is central.⁷ This tension gave rise to a tradition of 'choice' for women to enter the labour market or not. Thus, their access to this market was never prohibited in France but it was fundamentally controlled and limited by the role expected of them in the private sphere. Because they were guardians of the family, their outside work was perceived as a danger to the household. Furthermore, in a country where increasing the birth rate was a recurring preoccupation, women's employment was seen as dangerous to their health and therefore their fertility, as well as their ability to raise their children. By the end of the nineteenth century, a body of legislation was thus introduced in order to 'protect' working mothers: limitations on the working day, prohibition of night work.⁸ The effect of this legislation was to make the female workforce appear specific and requiring a treatment apart from the general rules applied to men (Battagliola 2000: 45-48).

The French 'wife-mother' model seems 'composite' because, as Lewis explains, the patriarchal control remained in the hands of the husband (much more than in those of employers, unions and governments, as in England) and was exercised in the family context. Unlike the British model, where the domestic space is a locus of power for women (a different but equal world, according to the two-sphere theory), in France, it was dominated by a patriarchal 'order'. By decreeing the 'civil disqualification' of married women, the Napoleonic Code instituted the 'marital (and paternal) power'. The male family head was given total power over his wife and children; he was by law the administrator of family matters. This civil disqualification (and the 'marital power') were abolished in 1938, but it was not until 1970 that the notion of 'family head' disappeared and paternal authority was

⁷ . In my view, it is this tension which accounts for the ambiguous if not contradictory nature of the French model, which I would therefore qualify as 'composite' rather than Lewis's 'modified'.

⁸ . It should be noted that France only resigned itself quite late—spring 2001—to conforming to European regulations, which exclude the prohibition of night work for women in the context of the elimination of discriminations in access to employment.

replaced by 'parental' authority. And the equality of the spouses in the management of the family property was only introduced in 1985.

In the tension between familism and individualism which runs throughout French political thought, the State has thus delegated its patriarchal power to the family head; the gender discriminations which it instituted with regard to work stemmed from its concern for the birth rate and the protection of women as mothers of (future) citizens. But at the same time, it has always recognised the reality of the woman's two roles as mother and worker. The State's financial support for families, meanwhile, has never been—as it was in the UK—a feminist demand. In France, family allowances were initiated by employers; they were thus conceived, on the one hand, in the context of the employers' desire to hold on to the labour force and, on the other, in the context of the State's preoccupations with the birth rate and the reproduction and 'quality' of its future citizens. In this way, the allowance for mothers at home, introduced in the 1920s, as well as the single-wage allowance (ASU) of the 1960s, were conceived as compensation for 'loss of earnings' much more than as a form of exclusion from the labour market.⁹

Thus, in the 1950s, the French model, albeit 'composite', of the 'male breadwinner' was well at work with an entire group of schemes limiting the wife-mothers' search for a wage. The joint taxation of households and the sharp wage inequalities between men and women tended to discourage the paid work of married women. The ASU offered complementary resources to families where the mother was unwaged. And there was no development of public childcare provision, although the existing supply was already much greater than in the United Kingdom. Contrary to the other two countries under study, France had a tradition in this area: nursery schools were created at the end of the nineteenth century, following the major educational reforms carried out by Jules Ferry.

The family, however, was viewed in France as an ancient, archaic world (belonging to the Ancien Régime) and was not a respected domain which could give access to modern, post-revolutionary citizenship (except for its 'head'). At the same time, the 'universal' State, born of the Revolution, could not discriminate between its children. Women were excluded from civic citizenship because of their dependence on the family head. And the institutionalisation of their dependence in the family (Napoleonic Code, family code) shaped their exclusion from civil citizenship. The French State thus appeared relatively neutral vis-à-vis women and work: no law prohibited their access to paid work; it simply protected mothers, in their working conditions and by providing financial aid to families in order to compensate the loss of earnings when mothers stayed at home to raise their children.¹⁰ In fact, the French State delegated the management of male-female relations in the public-private relationship to the family order and the head of the family.¹¹ Similarly, it allowed negotiations between employers and employees to define the role of women in employment, qualifications and wages.

I.3. Sweden: an understated model

During the 1950s, as in the United Kingdom and France, the paid work of wife-mothers was institutionally discouraged through joint taxation, formal wage discrimination and the absence of public childcare provision. But women's position in society was less dependent on their spouses.

⁹ . Even if the ASU had a real limiting effect on mothers' paid work (Martin 1998), the motivations behind the scheme clearly go back to the ideas of complement and compensation.

¹⁰ . The Vichy period (1940-1944) constituted a parenthesis in the absence of legislation prohibiting female access to paid work, but in face of the scarcity of labour, such legislation was little enforced and was even suspended in 1942 (Eck 1999: 198).

¹¹ . Cf. the idea, long defended, of the 'family vote', according to which the husband-father would vote for all of 'his' family with a number of ballots equal to the number of dependents (wife and children).

At the beginning of the twentieth century, however, Swedish women also appear to have been highly defined by the wife-mother status. In the social-democratic vision, Swedish society was constructed on the model of the 'people's home' as a place where no one enjoys privileges and everyone co-operates. Within such a model, the position of women was defined as that of mother and spouse and the family wage was the reference underlying the representation of paid labour.

As in the United Kingdom, this position for women enjoyed a certain status, and it would seem to have laid the basis for their access to civic and civil citizenship in the 1920s. Throughout the 1920s and 1930s, women members of the Liberal and Social Democratic parties worked to promote the cause of women. In the 1930s and 1940s, two Social Democrat economists, Alva and Gunnar Myrdal, played an important role in advancing the way the position of women was seen.¹² Rejecting the principle of the family wage, they argued that the whole of the society—and not just the families—should assume financial responsibility which children represented. They proposed universal family allowances and maternity services to be funded by general tax revenues. During the 1930s, a number of measures were in fact undertaken in this direction: free childbirth and medical follow-up, maternity allowances and abolition of the law prohibiting contraception. A law was also passed to prohibit the dismissal of women because of marriage or pregnancy.

The Myrdals' reconsideration of the position of women in Swedish society gave rise to the idea that women had two roles and should fulfil them, that the nation needed them to meet its needs in terms of babies as much as labour power.¹³

Thus, by the 1950s, and contrary to their French counterparts, Swedish women already had a long experience of citizenship. In the 1920s, they had acquired the right to vote and to be elected, as well as the civil rights which emancipated them from the tutelage of their husbands. Even if their access to the labour market was not encouraged, Swedish women were not confined to their family status: they benefited from their own social rights, in particular universal maternity allowances (as well as paid maternity leaves when they worked outside the home). As a result, we cannot really speak of the 'male breadwinner model', even if most women raised their children at home. Unlike the United Kingdom, the role of protecting mothers (and children, for that matter) was assigned to the State, which was not supposed to exercise 'control' (patriarchal or other) over individuals. Public assistance was required to respect the dignity of the person concerned.

The Swedish conception of the social order is profoundly anchored in individual and his or her rights and duties. The family was quite early conceived on the model of the contract between two independent individuals. As such, it belongs to the private sphere and does not concern public affairs except in terms of the protection of the individual, including the child. And children, from their earliest years, are citizens who, even if they cannot yet fulfil their duties, have certain rights: the right to well-being, accompaniment, education.¹⁴ In this conception of the social bond, the individual—man, woman or child—takes precedence over the family.

If we take the period from the 1930s to the 1950s as one marked by the assertion and expansion of the wage society in the industrialised countries, the wife-mother model structures the gendered dimension of these new social referents in all three countries considered here. Female labour-market-participation rates, and particularly those of mothers,

¹² . The Social Democrats came to power in Sweden in 1932 and governed continuously until 1976.

¹³ . See Alva Myrdal and Viola Klein, *Women's Two Roles: Home and Work* (London: Routledge and Kegan Paul, 1956).

¹⁴ . In the beginning of the twentieth century, faced with the plague of children abandoned by single mothers who could not care for them, the State assumed the role of the father through the intermediary of the child welfare officer (Hwang and Broberg 1992).

were low. Mothers either were predominantly absent from the labour market or showed limited participation in a family context. Paid work concerned mainly young women, prior to marriage and childbearing, or women who lived alone (single mothers) or belonged to families with chronic or temporary difficulties. Whatever the case, married women and mothers were thus little integrated into the wage society in their own right and were most often dependent on their husbands—as beneficiaries—for social rights. Nonetheless, significant variants set our three countries apart.

In the United Kingdom, women's access to paid work and women wage-earners' access to social rights were limited by the marriage bar. At the same time, however, married women enjoyed civil rights and were not considered minors under supervision.

In Sweden, as of the 1930s, mothers gained access to universal social rights which were independent of their status (waged/unwaged, married/single): free childbirth and maternity allowances. In fact, they had already been integrated into universal old-age and disability insurance, created in 1913 (Sainsbury 2000: 168). Their dependence in terms of family ties was considerably reduced relative to the French situation: the marriage code of 1929 granted equal rights and duties to the two spouses in various domains (Sainsbury 2000: 169). And the possibility for an employer to dismiss a woman on grounds of marriage or pregnancy was outlawed in 1938.

In France during the same period, the situation of women in relation to the wage society was very uneven. On the one hand, they were highly dependent on their family status within marriage for access to paid work and the rights accompanying it, and in general, their civil rights were extremely limited by their family status within marriage as minors under supervision. On the other hand, the husband's power to prevent his wife from accepting paid employment (abolished in 1965) was rarely used; the need for money and the financial advantage added to the fact that the husband was in any case 'de facto' administrator of the wife's possessions, offered him little incentive in this direction. The French State, meanwhile, recognised mothers' access to worker status while 'protecting' them. At the end of the 1920s, in the context of insurance, the law provided for maternity leave with compensation and free medical care for all women wage-earners, including those working at home (Battagliola 2000).

II. The model of male-female equality in work and family responsibilities

In the three countries considered here, women's labour-market participation began to increase in the 1960s, with a massive trend towards paid employment. The subsequent socio-political changes of the 1970s and 1980s gave rise to an egalitarian model of social relations between men and women. How did these new frames of reference affect the relationship of women to wage society?

II.1. Sweden: a particularly advanced model

In Sweden during the 1960s, a feminist critique of the social, economic and political spheres proposed a reconsideration of the rights and duties of men and women as 'human beings' in their dual roles as parents and workers. Both women and men, political or union activists, contributed proposals aimed at defining a programme to promote equality between the sexes. These proposals directly inspired the reforms of the 1970s and 1980s. The central argument was that the principle of full employment—one of the pillars of the 'Swedish model'—which had until then been implicitly associated with the male labour force, should also be applied to women, that employment should be a right and an obligation for everyone and that caring for one's children was, for men and women alike, part of their roles as human beings. Women were thus called upon to participate in the welfare state not only as citizens and mothers but also as full-fledged wage-earners.

This model of the ‘contract between the sexes’ (Hirdman 1994), in which women and men would be equal in both employment and parental responsibility, was finally adopted and implemented in the 1970s. A Commission on Equality between Men and Women, attached to the Prime Minister, was created in 1972 and measures were taken to encourage equality in the commitments of men and women to their professional and family responsibilities:

- Equal-wage schemes (abolition of separate wage scales for men and women in 1961);
- Work incentives for married women (replacement of joint taxation between spouses by separate taxation in 1971, which, given the highly progressive nature of the Swedish tax system, was a strong incentive);
- Parental leaves (created in 1974 with 70 % compensation of prior wages);
- The decision to create a large public childcare service (in 1970, only 8 % of Swedish children were received in public-funded childcare structures; by 1980, the figure had risen to 30 % [Broberg and Hwang 1991, Daune-Richard 1998a]);
- The introduction of forms of part-time employment with the same regulations and protections as full-time employment (in Sweden, the spread of part-time employment facilitated the mothers’ access to the labour market, which had not been a tradition).

It should be noted, however, that this change in behaviours occurred in a context which was favourable to employment. The chronic shortage of labour from the end of the Second World War to the late 1980s had initially promoted the recourse to immigration, but in the 1960s, it was decided to call upon the national resources constituted by women. At the same time, the social debate on male-female equality and its close connections with the referents of the Swedish model—solidarity, equality and employment for all—provided a fairly solid base for the political determination to develop a tradition of labour-market participation among women independently of their family responsibilities. It was in this spirit that part-time work spread, not as a precarious form of employment but as a way of organising working time (Daune-Richard 1998b). In such a context, female labour-market participation rates showed a considerable increase, going from 60 to 75 percent between 1970 and 1980.

II.2. France: an uncompleted model

In the ongoing French tension between ‘familialism’ and ‘individualism-feminism’ described above, the latter was to win out during the 1970s. Associated with the ‘benchmark’ of the ‘modernisation’ of France (Jobert and Muller 1987) which then dominated the political scene, the equality of rights and opportunities became an element of the social debate. As such, it was an issue in the political programmes opposing the Right and the Left. Jenson and Sineau (1995) show how, from the mid 1960s to the end of the 1970s, Socialist party head and future president François Mitterrand used the theme of female liberation to buttress his image as the candidate of modernity and change, thus leading President Valéry Giscard d’Estaing to take measures in this area, most often against the opinion of his own political camp. The mid 1970s saw the creation of the post of junior minister for the situation of women (elevated to the rank of minister at the end of the decade). Giscard d’Estaing’s presidency also saw the passage of the law authorising the voluntary interruption of pregnancy (*interruption volontaire de grossesse*, IVG) and the creation of the parental leave (*congé parental d’éducation*). The ASU, which encouraged mothers to remain outside the labour market, was abolished in 1977. And during the same decade, public childcare services were developed in the context of France’s modernisation programme: the number of places in day nurseries increased considerably, as did the schooling of children between two and five years old, which went from 50 percent in 1960 to 65 percent in 1970 and 82 percent in 1980 (*Les femmes* 1991: 139). At the same time, as in Sweden but in a less spectacular way, female labour-market participation rose from 49 percent in 1970 to 55 percent in 1980.

In this period marked by an egalitarian model of gender relations, familialism nonetheless retained its hold. Unlike what was happening in Sweden at the same time, no

reform of household taxation was implemented; indeed, at the dawn of the third millennium, joint taxation and the family quotient system are still in force. As for the parental leave created in 1977, until the beginning of the 1980s, it was only available to the father if the mother renounced her claim, and it was not remunerated.

II.3. The United Kingdom: a model faced with difficult beginnings

During the 1960s and 1970s, as in all the industrialised countries, the need for labour and the spread of tertiary jobs offered an opportunity for the growth of the female labour force. Egalitarian preoccupations also marked the British political debate and an equal-opportunity law was passed.

Nonetheless, the ways that the massive entry of women into the wage-earning population occurred largely respected the 'two spheres' theory:

- A widespread increase in part-time work, which was often short term and thus guaranteed no social rights;
- A withdrawal from the labour market because of childbirth: widespread in all socio-occupational categories, this interruption has only lessened since the end of the 1980s;
- No real maternity leave: it consisted only of a suspension of the work contract with a guarantee of re-employment; at the end of the 1980s, the job conditions giving access to such a 'leave' excluded nearly half of female wage-earners (Hantrais 1990). A 1994 European directive required the United Kingdom to adopt a real maternity leave, combined with a standard allowance and available to all female wage-earners.
- Extremely limited public childcare: at the end of the 1980s, childcare outside the home covered about 12 percent of children from 0 to 2 years old (2 % of them in public institutions) and 44 percent of those from 3 to 4 years old, but half of them on a part-time basis (Moss 1991).

In this context, female labour-market participation also rose (53 % in 1970, 61 % in 1980), but with discontinuous career paths and predominantly part-time work (for the same years, 39 % and 44 %, respectively) (Dex, Walters and Alden 1993). Until the mid 1990s, not only was there considerable part-time employment among British women (which is still the case for about 45 % of them) but the proportion of short-hour part-time jobs was very high (one-quarter of them worked at most ten hours a week, compared to 11 % of French women). In fact, under a certain number of hours worked or a certain income threshold, a part-time worker was considered 'non employed' and neither he (or she) nor the employer paid social contributions. As a result, the worker had no right to social protection and the income was not taxable. This kind of short-hour part-time work, considered as extra income, was used by wage-earners benefiting from social protection from other sources, notably married women.

The principle at work here was that, within a household, the main income and the social rights were provided by the husband. The wife might contribute a supplementary wage; if this did not attain a certain threshold, it was not subject to taxation or social contributions. For social rights, the wife, like those who remained unwaged, was the 'beneficiary' of her husband. Even when she acquired social rights from her own job, these could be reduced by her husband's situation; thus, unemployment benefits were subject to household resource conditions. The family wage remained the point of reference.

Overall, in the three countries considered here, the demand for labour characterising the post-war decades, the spread of tertiary employment and the wage-earning class drew women, and mothers in particular, towards the labour market. In the 1970s, they thus tended to gain access to paid employment and the accompanying social rights. However, this movement of women's emancipation and economic individualisation had its limitations.

Sweden is certainly the most advanced of the three countries in this respect. The movement was grounded in a political philosophy which considered the individual as the

basis of the social bond and saw the State as the guarantor and protector of individuality. Women gradually came to be considered full members of this world of the individual. In the 1970s and 1980s, the government introduced schemes intended to promote male-female equality by encouraging women's access to paid work and men's acceptance of their family responsibilities. However, "putting the wife-mothers to work" in a remunerated context meant a sharp increase in part-time work, and this led to inequality in the financial contributions of the two spouses. At the same time, equality in family responsibilities was far from being attained.

In France, this movement of economic emancipation took a particular direction because, unlike the other two countries, it occurred in a context where women's access to civic and civil rights was recent. In addition, the widespread decline in family production units, in which women's contributions were not remunerated and did not give them their own social rights, dates only from the 1950s.¹⁵ Last of all, the increase in the number of women wage-earners followed the earlier model: full-time, with temporary or definitive interruptions when family responsibilities became too great. At that point, they benefited from derivative rights linked to their status as wives.

The United Kingdom offers the least advanced situation with regard to the egalitarian model. On the one hand, women's access to paid employment followed the 'intermittence' model with alternating entries and exits (Dex, Walters and Alden 1993) and part-time work which, contrary to the situation in Sweden, was not regulated and often of short duration. On the other, public action preserved the wife-mother model insofar as the absence of increased childcare provision hindered mothers' access to the wage-earning world and support for 'marginal' part-time work (Fagan and O'Reilly 1998) pushed married women to remain economically dependent on their husbands and opt to remain the beneficiary of a 'real' employee.

III. The employment crisis, the crisis of the welfare state and changes in the egalitarian model

The time frame of the crisis and its effects varies considerably from one country to another. The employment crisis struck France in the second half of the 1970s. From the early 1980s to the present, significant measures undertaken to encourage the spread of part-time work and modify the forms of the public provision of childcare have transformed the labour-market access of mothers, and women in general. Sweden, meanwhile, continued its pursuit of the egalitarian model throughout the 1980s. With the employment crisis of the early 1990s, the population felt the effects of an economic crisis which had nonetheless been widely signalled by experts in previous years. This crisis has struck a serious blow at the 'Swedish model' with which the egalitarian model of male-female relations is closely linked. In this new context, both socio-economic and political, the advance towards the model of male-female equality seems more problematic. In the United Kingdom, meanwhile, the severe employment crisis of the 1970s and 1980s did not seem to produce profound changes in the principles of women's participation in the wage society.

III.1. In Sweden, the 1980s thus saw the development and institution of the previously defined egalitarian benchmark for public policies, based on increased childcare provision and women's access to autonomy through employment. The debate over childcare focused on two main ideas: parental responsibilities should not constitute a handicap for the professional engagements of the mothers and fathers and the forms of childcare should preserve the well-being of the children and the equalising of their educational conditions (cf. Daune-Richard

¹⁵ . The status of family assistant still concerned one out of every seven women in employment (14,2 %) in 1968 and 7 percent in 1987 (*Femmes en chiffres*, 1986; *Les Femmes*, 1995).

and Mahon 1998, 2001). Thus, the development of extensive public childcare was conceived as a support for the integration of women into the Swedish full-employment norm; at the same time, with regard to the children, it came under the principles of solidarity and equality as well as that of quality public service which was indispensable to the welfare state in its role as guarantor of individual and collective well-being.

In this context, a considerable effort was made to develop day nurseries. Only 2 percent of Swedish children of preschool age (0-6 years old) benefited from them in 1960 and less than 10 percent in 1970, but the figure had risen to 47 percent by 1985 (Broberg and Hwang 1991). Paid parental leaves were created in 1974 and from the outset were accessible to father and mother alike. The length of these leaves, gradually extended, reached fifteen months in 1988 (12 months remunerated at 90 % of the previous wage and three at a fixed rate). Since 1980, parents also benefit from sixty days of leave per year and per sick child (Sundström and Stafford 1992, Daune-Richard 1998a).

In parallel, part-time work continued to be developed in order to facilitate mothers' access to the labour market. In the prevailing context of full employment, it thus amounted to a protected form of employment adapted their situation, most often involving leaves with financial compensation. Since 1979, in addition to the parental leave, the law authorises Swedish parents to reduce their working hours to up to three-quarter time, without financial compensation, until the child reaches the age of eight.¹⁶ In 1970, part-time work involved 38 percent of women in employment, about 45 percent throughout the 1980s and 36 percent today. But unlike the situation in the United Kingdom, the part-time work in question has little to do with precariousness and is predominantly long-hour: in 1995, only 35 percent of women occupying part-time jobs in Sweden worked twenty hours or less, compared to 65 percent in the United Kingdom (nearly one-fourth of the total number of women in employment) and 50 percent in France (Eurostat).

At the end of the 1980s, the achievement of the egalitarian model of male-female relations nonetheless remained unfinished. If women had accomplished a real advance in restoring a balance between their parental and professional roles, the same was not true for men, who made relatively little use of the possibilities of reduced work activity in favour of parental commitments. And part-time work was highly feminised. Thus, at the close of the decade, the family model of two individuals who were equal with regard to professional and family commitments had not been achieved. For one thing, in terms of financial contributions, we might say that the Swedish family tended to function on the model of 'one and three-quarter breadwinners'. For another, parental time remained unequally divided between fathers and mothers.

In the early 1990s, this egalitarian model of male-female relations was further threatened by the crisis of the Swedish model—a crisis affecting the economy, employment and the welfare state—to which it was closely linked. A first effect resulted from the reduction of public spending which was (for our purposes) applied to replacement incomes for legal leaves (illness, training, parental) and childcare conditions (staff cutbacks). Even today, however, we can observe the strong resistance of the egalitarian 'contract between the sexes' model and the 'public' childcare model (Bergqvist and Nyberg 2002, Daune-Richard and Nyberg 2003). Objective indicators show that the evolution in this direction, even if it has clearly slowed down, remains continuous. In the area of labour-market participation and employment, the crisis has not affected women more than men. The public authorities' efforts in favour of childcare have been maintained in spite of budgetary restrictions. And a 1995 law now requires municipalities to provide one childcare space for each child (of one year or over) whose parents work or participate in formal training. Parental leaves, although they remain extensively utilised by mothers, are increasingly sought by fathers as well: in 1990, 8.8 percent of the parental leave days were used by fathers; in 1995 this figure rose to 10.3

¹⁶ . This scheme guarantees the return to full-time status.

percent and in 2000, 12 percent. Since 1993, moreover, the incentive in this direction has been pursued by the creation of a one-month parental leave ‘reserved’ for the father (i.e., non-transferrable to the mother).¹⁷

III.2. In France, the Socialist party’s arrival to power in 1981 occurred within the context of an ever-growing employment crisis, leading to the reduction of the State’s commitments and the call for greater labour flexibility. Major changes instituted in public policy regulating childcare and part-time work remain in force today.

With regard to childcare, emphasis has been placed on diversification and individualisation. The development of day nurseries was slowed down and measures were introduced to encourage families to turn to the private sector, notably allowances and tax reductions which, by reducing costs, assist them in engaging the services of a child minder.¹⁸ At the same time, the forms of access to parental leaves were modified. For one thing, eligibility was extended to fathers in 1984; for another, a parental allowance was created the following year for the parent of a third child who interrupts his or her employment to care for the new arrival at home until the age of three. A 1994 law extended this allowance to the second child and authorised the part-time use of the parental leave, which may now be combined with a part-time job. These schemes were intended to reduce budgets devoted to early childhood—day nurseries were held to be too expensive—but also, and perhaps above all, to diminish the labour supply of mothers and to create service jobs. If, in the 1970s, public support for childcare was, in spite of ambivalences, viewed as an encouragement of male-female equality and a new status for women in the society, the ideas dominating the debate from the mid 1980s to the mid 1990s had to do with ‘free choice’ and ‘reconciliation of family life and professional life’. In such a context, childcare was seen as a ‘form of adjustment of the family-job relationship’ (Hantrais and Letablier 1995), the terms of which depend on individual trade-offs within the families, with this ‘free choice’ leaving ‘free rein’ to the importance of family relations, in which economic autonomy tends to be a matter for the man and domestic responsibilities a matter for the woman. Thus, the responsibility for the adjustment has fallen primarily on women and mothers. The egalitarian pole of male-female relations has lost ground in favour of the familialist pole, where young children are above all an affair for women and mothers. In the 1990s, following the path traced by the EU recommendations for ‘reconciliation’ and in the context of public action to counter unemployment, the creation of ‘family’ jobs favoured the expansion of the private sector and a ‘market’ rationale for the care of children to the detriment of the egalitarian conception of ‘public service’ represented by the day nurseries, which are, for children under three, the equivalent of nursery school (Fagnani and Letablier 2003).

The same two decades saw a massive increase in part-time work. This expansion of a form of employment which was not traditional in France began in the early 1980s, at a time of rising, chronic unemployment. Successive governments, Right and Left alike, were to encourage and facilitate the spread of part-time work with the dual aim of meeting the demand of businesses in search of labour ‘flexibility’ and improving the employment situation by maintaining, increasing and sharing jobs. With the arrival of the Socialists to power in 1981, measures were taken to facilitate company recourse to part-time work (until then quite limited by regulations) and to protect employees hired on that basis (by guaranteeing them rights equal to those of full-time employees). In the early 1990s, reductions in social contributions were introduced for employers creating part-time jobs or transforming full-time ones. The spread of this form of employment has also been encouraged by schemes

¹⁷ . A second non-transferrable month was instituted in 2002.

¹⁸ . At present, fewer than 10 percent of French children under three years old are received in day nurseries.

assisting services to individuals (which are primarily part-time jobs) through allowances and the reduction of social-security contributions.¹⁹

Part-time work has mainly increased among women (13 % of female employment in 1973, 17 % in 1980, 24 % in 1990, 31 % today—compared to 5.5 % among males). It has also been the major component of job creation: since the 1970s, the labour market has lost about 800,000 male jobs, the majority of which are full-time, and gained 2.5 million female jobs, the majority of which are part-time (Majnoni d'Intignano 1999). The spread of this form of employment has certainly helped women to enter and remain in the labour market. At the same time, however, it has accentuated inequalities between men and women (women account for 80 % of low-paid workers) and between women themselves. Indeed, it contributes to polarising women into two groups: on the one hand, educated women with good jobs who, when they choose to make the switch to part-time, work thirty hours or more; on the other, low-skilled women often facing unemployment and precarious employment, who hold short-hour part-time jobs which are imposed by the employer and involve schedules particularly unfavourable to family life (Galtier 1999).

Thus, in France, the transformations of the women-wage-earner relationship do not constitute a real advance for the egalitarian model. Part-time work, which is combined with partial social rights, has expanded in conditions very often disadvantageous for the women and their families, financially and otherwise. And for the first time in three decades, labour-market activity among women with two young children has declined: access to the parental allowance for mothers of a second child (up to three years of age) has led to a 20 percent drop in their rate of labour-force participation.²⁰ The women who have most used this possibility are often those who were in difficulty on the labour market (precarious employment, unemployment) and face major difficulties in re-entering it (Afsa 1998, Simon 1999).

III.3. In the United Kingdom, despite a considerable rise in female labour-market participation and notably the employment of mothers, the wife-mother 'benchmark' seems to have maintained its hold. There are fewer exits from the labour market but part-time work has not declined (44.5 % of female employment in 2000), and in the United Kingdom this constitutes a highly unfavourable form of employment, with what are often very short-term jobs, difficult working conditions and sharp wage discriminations relative to full-time positions (cf. Rubery, Smith, Fagan and Grimshaw 1997 and Rubery 1998). The increased provision of childcare for young children has, until very recently, received little support from public authorities and has been assumed by the private sector, with the accompanying market rationale. Taken as a whole, childcare costs have risen (Finlayson 1996), which tends to accentuate inequalities between comfortable families (with two wage-earners earning good incomes) and poor ones (a single wage-earner and a low income) by depriving the latter of the possibility of a second wage.

In fact, it was the European Union's directives of the 1990s which forced the United Kingdom to improve the access of women wage-earners to social rights such as maternity leave (1994) and parental leave (recognised since December 1999 but without remuneration). The same is true for part-time work: in 1994, the European directive on this form of employment led the United Kingdom to reduce by one-half the threshold for part-time jobs not subject to social rights (8 hours a week instead of 16). In 1995, it was estimated that one-third of British part-time wage-earners were affected by this threshold (Osborne 1996: 235).

Last of all, since rights to unemployment compensation are not strictly attached to the individual but limited by the family income, many women are encouraged not to enter the labour market or even to withdraw from it when their husbands are unemployed and receiving

¹⁹ . Those concerning childcare were indicated earlier, but this type of scheme was created to assist the development of all these jobs.

²⁰ . In France, parents benefiting from such leaves are not counted in the labour force.

benefits. Even today, unemployment benefits are calculated by ‘household’ and if the two spouses are unemployed, the combining of their two allowances—or of one wage plus one right to compensation—can lead to the elimination of one allowance. It is thus often in the household’s ‘interest’ for one of the spouses to relinquish the claim to unemployment compensation, or even his or her job, so that the other’s rights to benefits are not eliminated. Since the man generally has the higher income—and thus the better benefits—the decision to withdraw most often falls upon the wife.

All things considered, the evolutions of these three countries from the 1950s to the end of the 1990s have been uneven. If we take the different variations of the wife-mother model as our starting point, we find that:

- Sweden continued along the path of extending social individualisation to include women. After acquiring their own civil and civic rights very early on—including rights within marriage—Swedish women were called upon to become full-fledged citizens in all areas of society, including the world of work. Even if gender equality in the wage society was not achieved, public policies continued to operate in this direction (Daune-Richard 2000, Daune-Richard and Nyberg 2003).

- The United Kingdom also pursued the path it had undertaken for many years. The hold of the ‘two spheres’ representation continued to provide the primary legitimacy of women in the domestic world. The early recognition of their civic and civil citizenship did not lead to that of full-fledged social citizenship. For one thing, their conditions of access to paid work remained extremely inegalitarian. For another, the individualisation of all social rights, especially those related to work, was not achieved and remained subject to the family context, which affected women in particular. A break with the past was nonetheless underway: in the context of its ‘welfare to work’ policy—and along the lines sketched out by the European Union’s effort to increase employment rates—the Labour government began to promote the image of the woman as worker rather than mother (even if this is not without certain problems, cf. Lewis 2002). Breaking with a tradition which leaves the responsibility for childcare to the families, it committed itself to developing a policy in this area.

- As for France, after a significant advance (from a legal standpoint) in the individualisation of rights in the 1980s and especially the 1990s, the position of women on the labour market was weakened by lawmakers and public action alike. In contrast to its previous position as a State dedicated to the protection of working mothers, France turned towards policies reviving a familialist vision of women’s roles in society. The scarcity of employment led to a policy of job sharing which was essentially gender based (Hirata and Sénotier 1996). The reforms of employment and childcare policies excluded preoccupations with equality between men and women from the political agenda (Jenson and Sineau 2001). At the beginning of the present decade, the creation of a paternity leave (in 2002), the government’s commitment to increase childcare provision and the introduction of the 35-hour work week marked an attempt to promote a model of gender equality in professional and family involvements but such measures do not seem—as of this writing—to have reversed that path (Fagnani and Letablier 2004).

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